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**Attorneys for Plaintiff Zoobuh, Inc.**

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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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ZOOBUH, INC., a Utah Corporation

Plaintiff,

vs.

BETTER BROADCASTING, LLC., a Utah  
limited liability company; IONO  
INTERACTIVE, a company doing business in  
Utah; ENVOY MEDIA, INC., a California  
Corporation; DOES 1-40

Defendants.

**MOTION AND MEMORANDUM  
FOR ENTRY OF  
DEFAULT JUDGMENT**

Case No.: 2:11cv00516-DB

Judge Dee Benson

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Pursuant to Fed. R. Civ. P. 55(b), Plaintiff respectfully moves the Court for entry of a Judgment by Default herein.

As grounds, and as more particularly set forth in the Affidavit of Jordan K. Cameron, a Certificate of Service and First Amended Complaint have been duly filed and served pursuant to an Order of this Court herein, the time for the response to such has expired, Defendants Iono

Interactive and Better Broadcasting, LLC (“Defendants”) have failed and/or refused to respond thereto or otherwise defend, and the relief requested in the First Amended Complaint is reasonable and appropriate under the circumstances.

A proposed form Judgment by Default and form Motion of Entry of Judgment are lodged herewith.

DATED this 1<sup>st</sup> day of March, 2012.

**HILL, JOHNSON & SCHMUTZ, LC**

/s/ Jordan K. Cameron  
Jordan K. Cameron  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 1<sup>st</sup> day of March, 2012 she caused a true and correct copy of the foregoing to be delivered to the following:

Better Broadcasting, LLC  
363 No. University Ave., Suite 110  
Provo, UT 84601

Iono Interactive  
363 No. University Ave., Suite 110  
Provo, UT 84601

Sent Via:

\_\_\_\_\_ Hand-Delivery  
\_\_\_\_\_ Facsimile  
  X   Mailed (postage prepaid)

/s/ Jordan K. Cameron